

**REMARKS/ARGUMENTS**

The examiner has objected to the Abstract of the Disclosure stating the last two sentences are extraneous. The Abstract of the Disclosure has been amended to delete the last two sentences that stated the purpose of an Abstract.

Claims 17 and 18 have been rejected under 35 USC 102 (b) as being anticipated by Driver (4,149,391). The examiner has stated that Driver discloses a drill pipe. Claims 17 and 18 have been cancelled.

Claims 1, 9, 12 and 16 have been rejected under 35 USC 103 (a) as being unpatentable over Baker, et al. (4,856,600) in view of Thiery, et al. (3,777,827). The examiner has stated that Baker discloses a drilling rig having a power source 42 attached to a rotatable reel 18, coiled flexible tubing drill pipe 16, drill bit 14, injector unit drive mechanism 20 adjacent the reel; and a conduit 26 positioned adjacent the drive. The examiner further states that while Baker does not disclose a container for the reel, that Thiery does show a container 7 for flexible drill pipe 2, and that it would be obvious to encase the Baker reel in a container as shown by Thiery to reduce bulkiness of a drilling device.

Claim 1 has been amended to more distinctly claim the unique structure of the pipe container of the instant invention. Support for this amendment may be found in Figure 1 and 8 of the original application. The pipe container of Thiery basically allows the laying of flexible pipe in an annular trough described as a container. The axis of rotation for the container is a vertical axis or otherwise the pipe would fall out of the container due to gravity. Such a container could not be used for a device such as that of Baker or the instant application as now claimed.

In the case of the instant invention as now claimed and originally described in the specification and drawing, the container may allow coiling of the pipe in the container such that the axis of rotation may be other than a vertical axis of rotation as in Thiery. As illustrated in Figure 1 this allows a horizontal axis of rotation for the container and a spooling out of the coiled

pipe along that axis of rotation. Combining the container of Thiery with the invention of Baker does not appear obvious other than to somehow combine a horizontal axis rotation reel with a vertical axis rotation annular trough container. For all of these reasons it is believed claim 1 as amended is distinguishable from the cited art.

Claim 9, 12, and 16 are dependent on what is now believed to be an allowable base claim and therefore should be allowed.

Claim 2 and 3 have been rejected under 35 USC 103 (a) as being unpatentable over Baker, et al. in view of Thiery, et al. and further in view of Driver. Claims 2 and 3 are dependent on what is now believed to be an allowable base claim and therefore should be allowed.

Claims 4 through 7 have been rejected under 35 USC 103 (a) as being unpatentable over Baker, et al. in view of Thiery, et al. and further in view of Cherry. Claims 4 through 7 are dependent on what is now believed to be an allowable base claim, claim 1 ultimately, and therefore should be allowed.

Claims 19 through 22 have been rejected under 35 USC 103 (a) as being unpatentable over Driver in view of Cherry. Claims 19 through 22 have been cancelled.

Claims 8, 10, 11 and 13 through 15 have been objected to, but would be allowable if rewritten in independent form. These claims are dependent on what is now believed to be an allowable base claim.

Claims 23, 24 and 25 have been allowed.

New claim 26 is based on claim 25 that has been allowed.

New claim 27 is believed allowable as claim 10 was sound to be allowable.

It is believed with the clarifying amendments that the uniqueness of the instant invention is not disclosed in the cited art. While various methods have been tried in the past, no drilling systems have provided the flexibility for drilling as presented in the instant invention. There has

been a long felt need for a solution to this problem.

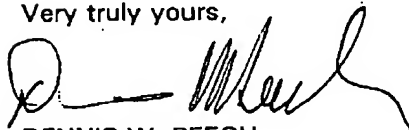
Accordingly it is believed that the rejections under 35 USC Section 102 (b) and 103 (a) have been overcome by canceling and amending of the claims and the remarks, and withdrawal thereof is respectfully requested.

In view of the above, it is submitted that the claims are in condition for allowance. Reconsideration of the cause for rejections and objections is requested. Allowance of claims 1 through 16 and 23 through 27 is earnestly solicited.

No additional fee for claims is seen to be required.

If you have any questions do not hesitate to contact me.

Very truly yours,



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OCT 02 2003

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